

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 19-728

v. : DATE FILED: _____

CRAIG ALEX LEVIN, : VIOLATIONS:
a/k/a "Alex Loring,"
a/k/a "Robert Smith" : 18 U.S.C. § 2423(b) (interstate and foreign
travel for the purpose of engaging in illicit
sexual conduct with a minor - 9 counts)
: 18 U.S.C. § 1591 (sex trafficking of a
minor – 2 counts)
: 18 U.S.C. § 2422(b) (use of an interstate
commerce facility to entice a minor to
engage in sexual activity – 1 count)
: 18 U.S.C. § 2252(a)(2), (b)(1) (distribution
of child pornography – 2 counts)
: 18 U.S.C. § 1470 (transfer of obscene
material to a minor – 1 count)
: 18 U.S.C. § 2252(a)(1) (transportation of
child pornography – 1 count)
Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this Superseding Indictment:

1. Defendant CRAIG ALEX LEVIN, a/k/a "Alex Loring," a/k/a "Robert Smith," was a United States citizen and resident of the Eastern District of Pennsylvania.
2. Facebook, Inc. ("Facebook"), an electronic communications service provider located in Menlo Park, CA, owned and operated a free-access social networking website of the same name that could be accessed at <http://www.facebook.com>. Facebook, using the Internet, allowed its users to establish accounts and use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the

general public.

3. Facebook “Messenger” was an instant messaging feature built into Facebook to access the Internet. The application was an instant messaging service that connected to the Facebook database and allowed Facebook users to connect with each other and send instant private messages, emojis, photographs, videos, and other functions. The “chats” between parties using Facebook Messenger were private and could only be viewed by other Facebook users who were included in the chats.

4. Defendant CRAIG ALEX LEVIN created and operated Facebook accounts “craig.levin.39” and “alex.loring.984,” and through these two accounts accessed and used Facebook Messenger to communicate with others, including minor children in the Philippines. Using these accounts, defendant LEVIN met and communicated with minors in the Philippines for the purpose of enticing them to engage in illicit sexual conduct with him during his visits to the Philippines.

5. In addition to communicating with minors, defendant CRAIG ALEX LEVIN used Facebook Messenger, a facility in interstate and foreign commerce, to send images depicting minors engaging in sexually explicit conduct and obscene photographs from his residence in the Eastern District of Pennsylvania to minors in the Philippines.

6. On at least one occasion, defendant CRAIG ALEX LEVIN traveled from the Eastern District of Pennsylvania to the Philippines for the purpose of engaging in illicit sexual conduct with minor girls who had not attained the age of 18.

7. On or about August 29, 2016, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

a United States citizen, traveled in interstate and foreign commerce for the purpose of engaging in illicit sexual conduct with a minor.

In violation of Title 18, United States Code, Sections 2423(b) and (f).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. On or about February 12, 2017, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

a United States citizen, traveled in interstate and foreign commerce for the purpose of engaging in illicit sexual conduct with a minor.

In violation of Title 18, United States Code, Sections 2423(b) and (f).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. On or about July 14, 2017, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

a United States citizen, traveled in interstate and foreign commerce for the purpose of engaging in illicit sexual conduct with a minor.

In violation of Title 18, United States Code, Sections 2423(b) and (f).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. On or about September 18, 2017, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

a United States citizen, traveled in interstate and foreign commerce for the purpose of engaging in illicit sexual conduct with a minor.

In violation of Title 18, United States Code, Sections 2423(b) and (f).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. On or about November 7, 2017, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

a United States citizen, traveled in interstate and foreign commerce for the purpose of engaging in illicit sexual conduct with a minor.

In violation of Title 18, United States Code, Sections 2423(b) and (f).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. On or about February 6, 2018, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

a United States citizen, traveled in interstate and foreign commerce for the purpose of engaging in illicit sexual conduct with a minor.

In violation of Title 18, United States Code, Sections 2423(b) and (f).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. On or about September 24, 2018, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

a United States citizen, traveled in interstate and foreign commerce for the purpose of engaging in illicit sexual conduct with a minor.

In violation of Title 18, United States Code, Sections 2423(b) and (f).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. On or about January 27, 2019, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

a United States citizen, traveled in interstate and foreign commerce with a motivating purpose of engaging in illicit sexual conduct with a minor.

In violation of Title 18, United States Code, Sections 2423(b) and (f).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. On or about May 6, 2019, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

a United States citizen, traveled in interstate and foreign commerce, that is, the United States, to the Philippines, with a motivating purpose of engaging in illicit sexual conduct with a minor.

In violation of Title 18, United States Code, Sections 2423(b) and (f).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. From in or around December 2017 through in or around May 2018, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant,

**CRAIG ALEX LEVIN,
a/k/a "Alex Loring,"
a/k/a "Robert Smith,"**

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, maintain, solicit, and patronize by any means a person, and attempted to do so, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, and having had a reasonable opportunity to observe the person.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), (c), 1594 and 1596(a)(1).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. In or around October 2018, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, maintain, solicit, and patronize by any means a person, that is, Minor 5, who is known to the grand jury, and attempted to do so, knowing and in reckless disregard of the fact that Minor 5 had not attained the age of 18 years and would be caused to engage in a commercial sex act, and having had a reasonable opportunity to observe Minor 5.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), (c), 1594 and 1596(a)(1).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. From in or around April 2019 to in or around May 2019, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

used a facility and means of interstate and foreign commerce, that is, the Internet, to knowingly persuade, induce, entice and coerce Minor 3, who had not attained the age of 18 years and is known to the grand jury, to engage in prostitution and any sexual activity for which any person could be charged with a criminal offense, that is, travel in foreign commerce and engaging in illicit sexual conduct, in violation of Title 18, United States Code, Section 2423(c), and attempted to do so.

In violation of Title 18, United States Code, Section 2422(b).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. On or about April 13, 2019, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

knowingly distributed a visual depiction using any means and facility of interstate and foreign commerce, by any means, including by computer, the producing of that visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2), (b)(1).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. On or about April 17, 2019, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

knowingly distributed a visual depiction using any means and facility of interstate and foreign commerce, by any means, including by computer, the producing of that visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2), (b)(1).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. On or about April 9, 2019, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

used the Internet, a facility and means of interstate and foreign commerce, to knowingly transfer obscene matter to an individual, Minor 4, who is known to the grand jury and had not attained the age of 16 years, knowing that Minor 4 had not attained the age of 16 years, and attempted to do so.

In violation of Title 18, United States Code, Section 1470.

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations in paragraphs 1 through 6 of Count One are incorporated and realleged here.
2. On or about May 6, 2019, in the Eastern District of Pennsylvania, the Philippines and elsewhere, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

knowingly transported, using means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, an Apple laptop, model A1466, containing visual depictions that involved the use of minors engaging in sexually explicit conduct. The production of these visual depictions involved the use of minors, including prepubescent minors and minors who had not attained 12 years of age, engaging in sexually explicit conduct and the visual depictions were of minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Sections 2252(a)(1) and (b).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1470, 1591, 1594, 2422(b), 2423(b), and 2252, as set forth in this Superseding Indictment, defendant

**CRAIG ALEX LEVIN,
a/k/a “Alex Loring,”
a/k/a “Robert Smith,”**

shall forfeit to the United States of America:

(a) any visual depiction, or any film, videotape, or other matter which contains any child pornography, which was produced, transported, mailed, shipped, or received as a result of such violations as charged in the Superseding Indictment;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violations; and

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violations, including, but not limited to:

- i. One Apple MacPro Laptop bearing serial no. C2FXC50DDH2G with charger;
- ii. One Samsung cellular phone bearing serial no. R21M304L4AZ;
- iii. One Apple laptop computer, model A1466, EMC2925, #C1MT9912H3QF, seized from Craig Alex LEVIN on or about May 24, 2019, by the Philippine National Police;
- iv. One Apple iPhone, serial number unknown, seized from Craig Alex LEVIN on or about May 24, 2019, by the Philippine National Police;
- v. One Kingston, white/purple USB drive, seized from Craig Alex LEVIN’s home, located at 633 Coates Lane, King of

Prussia, PA, on or about August 5, 2019;

- vi. One iMac, bearing serial number W8718101WH5, seized from Craig Alex LEVIN's home, located at 633 Coates Lane, King of Prussia, PA, on or about August 5, 2019;
- vii. One Sandisk, 16GB Memory Card, seized from Craig Alex LEVIN's home, located at 633 Coates Lane, King of Prussia, PA, on or about August 5, 2019;
- viii. One iPhone, model A1453, seized from Craig Alex LEVIN's home, located at 633 Coates Lane, King of Prussia, PA, on or about August 5, 2019;
- ix. One Laptop charger, seized from Craig Alex LEVIN's home, located at 633 Coates Lane, King of Prussia, PA, on or about August 5, 2019; and
- x. One Black Palm cellular phone, seized from Craig Alex LEVIN's home, located at 633 Coates Lane, King of Prussia, PA, on or about August 5, 2019.

If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Sections 1467, 2253 and 2428, and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 1467, 1594(d) and (e), 2253 and 2428, and Title 28, United States Code, Section 2461(c).

[REDACTED]
[REDACTED]
GRAND [REDACTED] N


JENNIFER ARBITTIER WILLIAMS
Acting United States Attorney

Criminal No. 19-728

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF PENNSYLVANIA

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

CRAIG ALEX LEVIN

a/k/a "Alex Loring," a/k/a "Robert Smith"

SUPERSEDING INDICTMENT

Counts

18 U.S.C. § 2423(b) (interstate & foreign travel for the purpose of engaging in illicit sexual conduct with a minor - 9 counts); 18 U.S.C. § 1591 (sex trafficking of a minor - 2 counts); 18 U.S.C. § 2422(b) (use of an interstate commerce facility to entice a minor to engage in sexual activity - 1 count); 18 U.S.C. § 2252(a)(2), (b)(1) (distribution of child pornography - 2 counts); 18 U.S.C. § 1470 (transfer of obscene material to a minor - 1 count); 18 U.S.C. § 2252(a)(1) (transportation of child pornography - 1 count); Notice of forfeiture

[REDACTED]
[REDACTED] Foreman

[REDACTED] this [REDACTED] A.D. 20 [REDACTED] day,

Clerk

Bail, \$ [REDACTED]